



August 31, 2017

Wayne Robinson
2984 200th Avenue
Mechanicsville, IA 52306

SUBJECT: Desktop Assessment - Wayne Robinson Feedlots, ID #61876 & 56798, Jones County

Dear Mr. Robinson:

The Iowa Department of Natural Resources (IDNR) has conducted desktop assessments of your animal feeding operations for the purpose of determining compliance with applicable federal and state regulations, particularly National Pollutant Discharge Elimination System (NPDES) permit requirements. These assessments were conducted by reviewing file information, spill or discharge history, data from IDNR's animal feeding operation (AFO) database, and utilization of mapping information readily available to the public.


Based on the location of your operations, their compliance history and current animal capacity, it has been determined that the desktop assessments are sufficient to indicate the operations are likely in compliance regarding federal and state animal feeding operation requirements. Onsite inspections will not be necessary at this time. Should more information become available, conditions at the operations change, or there is a report of a discharge, an on-site inspection may be conducted.

During our telephone conversation on August 31, 2017, I determined that you are operating both feedlots as Small Animal Feeding Operations (SAFOs). **Please contact this office should you decide to populate either feedlot with more than 300 cattle so that we may update our records.**

As the owner of this facility, you have an ongoing responsibility to comply with all local, state and federal laws, as well as any relevant ordinances, regulations and other requirements. This letter is based on information available at the time it was written (as explained above) and is not intended to be an all-inclusive record of compliance issues, past or future.

If you have any questions, please contact me at 563/927-2640, Ext. 313.

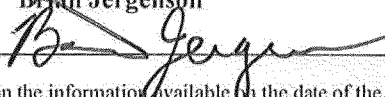
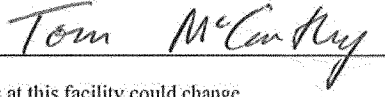
Sincerely,


Brian Jergenson, Environmental Specialist Senior
brian.jergenson@dnr.iowa.gov
Field Services and Compliance Bureau

C: Ken Hessenius, IDNR, FO3, AFO Enforcement Coordinator, Spencer, IA (email only)
Stephen Pollard, U.S. EPA Region 7, WWPDP/WENF, 11201 Renner Blvd., Lenexa, KS 66219
(email only)

Enclosure: AFO Desktop Assessment Forms, AFO Regulatory Status

IOWA DEPARTMENT OF NATURAL RESOURCES AFO Desktop Assessment Form					
Assessor: Brian Jergenson		Assessment Date: 08/31/2017			
Documentation Examined:					
<input checked="" type="checkbox"/> AFO Siting Atlas		<input checked="" type="checkbox"/> Facility File		<input checked="" type="checkbox"/> FOCD	
<input checked="" type="checkbox"/> AFO Database		<input type="checkbox"/> MMP		<input checked="" type="checkbox"/> Public Mapping Information <u>Google Maps</u>	
<input type="checkbox"/> Other _____					
FACILITY LOCATION		FACILITY: Wayne Robinson Feedlot (Section 36)			FACILITY ID#: 61876
ADDRESS: 1917 200 th Avenue		CITY: Mechanicsville		STATE: IA	ZIP: 52306
PLSS: Section 36, Greenfield Township (T83N, R04W), Jones County					
OWNER		NAME: Wayne Robinson			
ADDRESS:		CITY:		STATE:	ZIP:
WORK:		HOME:		CELL:	
EMAIL:					
ANIMAL INFORMATION		ANIMAL TYPE(S)	CAPACITY	CURRENT HEAD	# OF PENS
		Cattle Beef-Finisher Swine Wean-Finish	175 0	43 0 for 15 yrs	Unknown
FACILITY TYPE		<input type="checkbox"/> Confinement		<input checked="" type="checkbox"/> Open Lot	
		<input type="checkbox"/> Combined			
STORAGE TYPE		<input type="checkbox"/> Liquid		<input checked="" type="checkbox"/> Dry	
		<input type="checkbox"/> Covered		<input checked="" type="checkbox"/> Uncovered	
STORAGE STRUCTURE TYPE		<input type="checkbox"/> Earthen Manure Storage Structure #		<input type="checkbox"/> Anaerobic Lagoon #	
		<input type="checkbox"/> Below Building Pit #		<input type="checkbox"/> Aerobic Lagoon #	
		<input checked="" type="checkbox"/> Outside Concrete Pit #		<input type="checkbox"/> Outside Stockpile #	
		<input type="checkbox"/> Slurry-store #		<input type="checkbox"/> Covered Stockpile #	
		<input type="checkbox"/> Unknown			
AFO/CAFO Status		<input type="checkbox"/> Large CAFO [†]		<input type="checkbox"/> Medium AFO	
		<input checked="" type="checkbox"/> Small AFO			
[†] All large CAFOs require an onsite inspection.					
NEAREST WATERCOURSE		Watercourse Name: Unnamed Tributary to White Oak Creek			
		Distance between facility and nearest watercourse:		<input checked="" type="checkbox"/> < ¼ mile ^{††}	
				<input type="checkbox"/> > ¼ mile	
Description of flow path(s) to watercourse: 140 feet northeast to UT					
^{††} All medium combined or open lot AFOs within a ¼ mile of a watercourse and that drain towards that watercourse require an onsite inspection. All medium confinement AFOs that utilize uncovered manure/litter storage and are within a ¼ mile of a watercourse and that drain towards that watercourse require an onsite inspection.					
COMPLIANCE HISTORY		Has there been a discharge to a Water of the U.S. within the last 5 years?		<input type="checkbox"/> Yes ^{†††}	
				<input checked="" type="checkbox"/> No	
		If yes, did the facility permanently remedy the cause of the discharge?		<input type="checkbox"/> Yes	
				<input type="checkbox"/> No	
				<input type="checkbox"/> Unknown	
^{†††} All medium confinement AFOs that have discharged to water of the U.S. within the last 5 years require an onsite inspection.					
		Has there been a significant release within the last 5 years?		<input type="checkbox"/> Yes	
				<input checked="" type="checkbox"/> No	
		If yes, did the release present a significant threat of discharge?		<input type="checkbox"/> Yes*	
				<input type="checkbox"/> No	
				<input type="checkbox"/> Unknown	
* All medium confinement AFOs that have had a significant release in the last 5 years and the release presented a significant threat of discharging to a water of the U.S. require an onsite inspection.					
		Have there been any complaint investigations?		<input type="checkbox"/> Yes	
				<input checked="" type="checkbox"/> No	
If yes, describe:					
		Has an onsite inspection been conducted at this facility since 11/1/11?		<input type="checkbox"/> Yes	
				<input checked="" type="checkbox"/> No	
		If yes, was the inspection functionally equivalent to facility type specific SOP (i.e., confinement, open feedlot or combined)?		<input type="checkbox"/> Yes**	
				<input type="checkbox"/> No	
				<input checked="" type="checkbox"/> N/A	
		Inspection Date:		Describe:	

RUNOFF ASSESSMENT	** No onsite inspection is required if a functionally equivalent inspection has been performed since 11/1/11.				
	Is there evidence that manure, litter, or process wastewater is uncontrolled and/or unmanaged?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Unknown
	If yes, describe:				
	Are there tile intakes within 100 feet of the production area?		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
	If yes, describe:				
	Does the facility utilize uncovered/uncontrolled composting areas?		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
	If yes, describe:				
<u>Note: If assessor answered "Yes" to any of the questions in this section, then an onsite inspection should be performed.</u>					
	<p>Assessment Notes/Comments:</p> <p>After discussion with Wayne Robinson: he is operating as SAFO, will be selling cattle in the fall, and likely won't be repopulating this feedlot. Due to this facility's classification as a SAFO an onsite inspection is not required.</p>				
	<input type="checkbox"/> ONSITE INSPECTION REQUIRED.		<input checked="" type="checkbox"/> ONSITE INSPECTION <u>NOT</u> REQUIRED.		
AUTHENTICATION	INSPECTOR: Brian Jergenson 	DATE: 08/31/2017	REVIEWER: Tom McCarty 	DATE: 08/31/17	
Note: This assessment was based on the information available on the date of the assessment. Conditions at this facility could change.					

Wayne Robinson Feedlot (Section 36)
Facility ID# 61876





Animal Feeding Operation (AFO) Regulatory Status

Facility Name: Wayne Robinson Feedlot Facility ID: 61876 County: Jones

- ☐ Large CAFO – Discharging – NPDES Permit Required
- ☐ Large CAFO – No discharge – No NPDES Permit Required
- ☐ Large CAFO – Has NPDES Permit
- ☐ Medium CAFO – NPDES Permit Required
- ☐ Medium AFO – No NPDES Required
- ☐ Medium AFO – Has NPDES Permit
- ☐ Designated CAFO – NPDES Permit Required
- ☒ Small AFO – No NPDES Permit Required

This determination was made based on conditions and observations made at the time of the desktop assessment on 8/31/2017. Please note that the regulatory status of the facility can change if conditions at the facility change or are different from those documented during the desktop assessment.

Inspector: Brian Jergenson Date: 08/31/2017

Regulatory Definitions of Large CAFOs, Medium CAFOs, and Small CAFOs

These regulatory definitions are from the Code of Federal Regulations (CFR), implementing the federal Clean Water Act.

A **Large CAFO** confines at least the number of animals described in the table below.

A **Medium CAFO** falls within the size range in the table below and either:

- “(A) Pollutants are discharged into waters of the United States through a man-made ditch, flushing system, or other similar man-made device; or
- (B) Pollutants are discharged directly into waters of the United States which originate outside of and pass over, across, or through the facility or otherwise come into direct contact with the animals confined in the operation.” 40 CFR 122.23(b)(6)(ii)

If an operation is found to be a significant contributor of pollutants to waters of the United States, the permitting authority may designate a medium-sized facility as a CAFO as provided in 40 CFR 122.23(c).

A **Small CAFO** confines the number of animals listed in the table and has been designated as a CAFO by the permitting authority after determining that it is a significant contributor of pollutants to waters of the United States as provided in 40 CFR 122.23(c).

Animal Sector	Size Thresholds (number of animals)		
	Large CAFOs	Medium CAFOs	Small CAFOs
cattle or cow/calf pairs	1,000 or more	300 – 999	less than 300
mature dairy cattle	700 or more	200 – 699	less than 200
veal calves	1,000 or more	300 – 999	less than 300
swine (weighing over 55 pounds)	2,500 or more	750 -2,499	less than 750
swine (weighing less than 55 pounds)	10,000 or more	3,000 – 9,999	less than 3,000
horses	500 or more	150 – 499	less than 150
sheep or lambs	10,000 or more	3,000 – 9,999	less than 3,000
turkeys	55,000 or more	16,500 – 54,999	less than 16,500
chickens other than laying hens (other than a liquid manure handling system)	125,000 or more	37,500 – 124,999	less than 37,500
laying hens (other than a liquid manure handling system)	82,000 or more	25,000 – 81,999	less than 25,000